

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,) No. 4:23-CR00692 SEP
)
Plaintiff,)
)
vs.)
)
TERRELL WILLIAMS,)
)
Defendant.)

SENTENCING MEMORANDUM

Comes now Terrell Williams, by and through his attorney, and states to the Court as follows:

1. The Defendant is scheduled for sentencing before this Honorable Court. The applicable sentencing statute, 18 U.S.C. §3553(a), assigns to this court the duty to impose a sentence that is sufficient, but not greater than necessary, to satisfy the statutory purposes of sentencing.
2. The defendant pleaded guilty to one count of Animal Fighting, under 7 U.S.C. Section 2156.
3. The pre-sentence investigation report prepared by the Department of Probation sets forth a sentencing calculation which places the defendant, at a total offense level of 13, and a criminal history category of II. This equation sets the suggested range of punishment at 15 to 21 months.
4. Terrell Williams is a 52 year old lifelong resident of St. Louis, Missouri.

Terrell was born into a family where his father wasn't around much. His family all came from Mississippi. African American people in the St. Louis, Missouri area largely migrated here when they were freed from slavery. During his youth Terrell would be sent back to family, that still resided in rural Tennessee, to visit for summers. He had an uncle in Tennessee who introduced Terrell to dog fighting. Terrell was young and impressionable. Dog fights in the south were attended by black and white people. To a young boy it seemed ok; It was an activity that the grownups took part in. It was no surprise that as Terrell grew older he continued to be interested in dog fighting. It appears as though the majority of people in the St. Louis area engaged in dog fighting are African American; this isn't a coincidence.

A brief glance at the history of dog fighting sheds some light on how this practice became part of the southern, African American, primarily rural, landscape.

Pitbulls made their way to America sometime around 1845 to 1860 where they were included in the Military, especially during the Civil War, as infantry mascots and as attack and search and rescue dogs on the front line.

Fighting dogs were introduced by the British into four colonial domains in America, but were especially coveted in slave plantations in the south. The dogs, often referred to as 'catch dogs' were relied upon to carry out tasks such as killing rats, help hunt boar, protect the home and *catch runaway slaves*.

Following the Civil War and emancipation, African American men began to enter the primarily white-only dog fighting fray. African American men at this time would operate dogfighting in black only settings. They had small fight purses, informal fights, and the fights often took place in alleyways, backstreets, or out of the way areas, similar to underground dogfighting in modern times.

https://www.researchgate.net/publication/284170655_Pit_bulls_slavery_and_whiteness_in_the_mid-_to_late-nineteenth-century_US

Dog fighting has been studied by many sociologists. In one study

"ninth-graders they interviewed in a secondary school in Pontiac, Michigan, admitted that they had attended dogfights. Most of them stated that there was nothing wrong with those events. This led the authors to conclude that those children were desensitized to violence to such a high degree that they did not perceive dogfights as cruel, immoral acts. There is also a risk that exposure of young people to these organized acts of animal abuse may lead to later development of behavioral traits that include animal abuse as well as bullying and delinquency"

Kalof, L., & Taylor, C. (2007). The Discourse of Dog Fighting. *Humanity & Society*, 31(4), 319-333. <https://doi.org/10.1177/016059760703100403> (Original work published 2007)

Terrell works and has a wonderful wife and family. He got into some trouble while he was younger. He served a 60 month sentence for a drug violation in 2007, when he was 34 years old. He has consistently worked since being placed on supervised release. He is now employed in the towing industry. He has been in the towing business for a few years, including making an upward move to another company. While Terrell managed to get most criminal activity out of his system the dog fighting remained. The sociological study cited above may have some relevance. Terrell knew that the activity was illegal, but somehow, he was desensitized to it. His attitude after being charged in this case has been one of complete ownership and responsibility for his conduct. He has completely removed dog fighting and the people he knew in dog fighting from his life. He is looking forward to serving his sentence and paying his debt to society. He takes responsibility for his actions....unconditionally. His absence will be a hardship to his family. He wants to do his time, get out, and get back to supporting his family.

The government and Terrell entered into a plea agreement wherein the parties would both recommend a sentence of 18 months imprisonment. It is Defense Counsel's position that a sentence of 18 months will satisfy the requirements of the sentencing law. It's unlikely that the criminal justice system will ever see Terrell again.

WHEREFORE, Terrell Williams respectfully requests that the Court, consistent with the aforementioned law, sentence the defendant to a term of imprisonment of 18

months, and any other relief the Court deems appropriate, under the circumstances for the following reasons, counsel believes that such a sentence is sufficient, but not greater than necessary, to satisfy the statutory purposes of sentencing.

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PROOF OF SERVICE

The undersigned certifies that the above was electronically pursuant to the ECF rules on this 8th day of July 2025.

s/ Kenneth R. Schwartz